

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, FTX
TRADING LTD., WEST REALM SHIRES,
INC., AND WEST REALM SHIRES
SERVICES INC. (D/B/A FTX.US),

Plaintiffs,

v.

DANIEL FRIEDBERG,

Defendant.

Adv. Pro. No. 23-50419 (JTD)

**STIPULATION REGARDING DEADLINES FOR ANSWER
AND MOTION TO DISMISS**

Plaintiffs, Alameda Research LLC, FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services Inc. (d/b/a FTX.US) (the “Plaintiffs”), and Defendant Daniel Friedberg (the “Defendant” and, together with the Plaintiffs, the “Parties”), by and through their respective undersigned counsel, enter into this *Stipulation Regarding Deadlines for Answer and Motion to Dismiss* (the “Stipulation”) and hereby stipulate and agree as follows:

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

1. On June 27, 2023, the Plaintiffs initiated the above-captioned adversary proceeding by filing the *Complaint* [Adv. D.I. 1] (the “Complaint”).

2. On July 7, 2023, the Defendant executed a *Waiver of the Service of Summons* [Adv. D.I. 6], agreeing to accept and waive his objections, if any, to service of process. The Defendant’s deadline to respond to the Complaint was September 15, 2023.

3. On September 27, 2023, the Plaintiffs filed the *Stipulation for an Extension of Time for Defendant to Respond to Complaint* [Ad. D.I. 8], extending the Defendant's deadline to respond to the Complaint to October 4, 2023.

4. On October 6, 2023, the Court entered the *Order Approving Second Stipulation for Extension of Time for Defendant to Respond to Complaint* [Adv. D. I. 10], extending the Defendant’s deadline to respond to the Complain to October 20, 2023.

5. On October 20, 2023, Defendant filed (a) *Defendant’s Answer, Affirmative Defenses, and Counterclaims* [Adv. D.I. 14] (the “Answer and Counterclaims”); and (b) *Defendant’s Motion to (A) Dismiss Plaintiffs’ Counts IX and X Partially and (B) Dismiss Plaintiffs’ Count XI in its Entirety* [Adv. D.I. 11] (the “Motion to Dismiss”).

6. The Parties have conferred regarding an agreement on the briefing schedule and response deadline for the Answer and Counterclaims and Motion to Dismiss.

7. Any responses to the Answer and Countercaims and Motion to Dismiss (including any potential amended pleadings, motions to strike, and motions to dismiss) shall be due on or before December 19, 2023.

8. If Plaintiffs oppose Defendant’s motion to dismiss, any reply shall be due on or before January 23, 2024.

9. If Plaintiffs move for leave to amend their pleadings, move to strike, or move to dismiss Defendant's counterclaims, any opposition to those motions shall be due on or before January 23, 2024. Any reply shall be due on or before February 20, 2024.

Dated: November 3, 2023

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, DE 19801
Telephone: (302) 467-4400
landis@lrclaw.com
mcguire@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

Counsel to the Debtors and Debtors-in-Possession

-and-

QUINN EMANUEL URQUHART & SULLIVAN, LLP

William A. Burck (admitted *pro hac vice*)
1300 I Street NW, Suite 900
Washington, D.C. 20005
(202) 538-8000
williamburck@quinnemanuel.com

Sascha N. Rand (admitted *pro hac vice*)
Katherine A. Lemire (admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000
sascharand@quinnemanuel.com
katherinelemire@quinnemanuel.com

Special Counsel to the Debtors

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Rafael X. Zahralddin

Rafael X. Zahralddin (No. 4166)
500 Delaware Avenue, Suite 700
Wilmington, DE 19801
Telephone: (302) 985-6004
Rafael.Zahralddin@lewisbrisbois.com

Counsel to Defendant Daniel Friedberg